

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,
Debtors.¹

PROMESA
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

PUERTO RICO ELECTRIC POWER AUTHORITY,
Debtor.

PROMESA
Title III

No. 17 BK 4780-LTS

**Court Filing Relates Only to
PREPA and Shall Only Be
Filed in Case No. 17 BK 4780-
LTS and Main Docket 17 BK
3283-LTS**

**NOTICE OF REVISED PROPOSED ORDER REGARDING THE URGENT MOTION
OF THE AD HOC GROUP OF PREPA BONDHOLDERS PURSUANT TO SECTION 312
OF PROMESA AND SECTION 105 OF THE BANKRUPTCY CODE TO APPOINT A
MEDIATOR AND IMPOSE DEADLINES FOR A PREPA PLAN OF ADJUSTMENT**

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

To the Honorable United States District Court Judge Laura Taylor Swain:

The Ad Hoc Group of PREPA Bondholders (the “Ad Hoc Group of Bondholders”) respectfully submits this notice (“Notice”) to inform the Court that it has reached an agreement with the Ad Hoc Group of Fuel Line Lenders¹ on a form of proposed order, in the form attached hereto as **Exhibit A** (“Revised Proposed Mediation Order”), granting the Ad Hoc Group of Bondholders’ request to appoint a mediator made in its *Urgent Motion of the Ad Hoc Group of PREPA Bondholders Pursuant to Section 312 of PROMESA and Section 105 of the Bankruptcy Code to Appoint a Mediator and Impose Deadlines for a PREPA Plan of Adjustment* [ECF No. 2718] (the “Mediation & Plan Deadline Motion”). Also attached hereto as **Exhibit B** is a blackline version of the Revised Proposed Mediation Order to show the changes that have been made to the version attached to the Mediation and Plan Deadline Motion. The Ad Hoc Group of Bondholders understands that the changes reflected in the Revised Proposed Mediation Order hereby resolve any objections of the Ad Hoc Group of Fuel Line Lenders to the appointment of a mediator sought in the Mediation & Plan Deadline Motion. The Ad Hoc Group of Bondholders also plans to include the Revised Proposed Mediation Order as an exhibit to its reply to the Mediation & Plan Deadline Motion, which it will file consistent with the deadlines set by this Court. *See Order Granting Urgent Motion for Expedited Consideration of Urgent Motion of the Ad Hoc Group of PREPA Bondholders Pursuant to Section 312 of PROMESA and Section 105 of the Bankruptcy Code to Appoint a Mediator and Impose Deadlines for a PREPA Plan of Adjustment* [ECF No. 2719].

WHEREFORE, the Ad Hoc Group of Bondholders respectfully requests that the Court enter the Revised Proposed Mediation Order, attached hereto as **Exhibit A**, granting the relief

¹ As defined in the *Verified Statement of the Ad Hoc Group of Fuel Line Lenders Pursuant To Federal Rule Of Bankruptcy Procedure 2019* that will be filed on or about the date hereof.

requested herein, enter the proposed order attached as Exhibit B to the Mediation & Plan Deadline Motion, and grant such other relief as the Court deems just and proper.

Dated: San Juan, Puerto Rico
February 25, 2022

Respectfully Submitted,

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I HEREBY CERTIFY that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will notify case participants.

/s/ Nayda Perez-Roman
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